

**Remarks:**

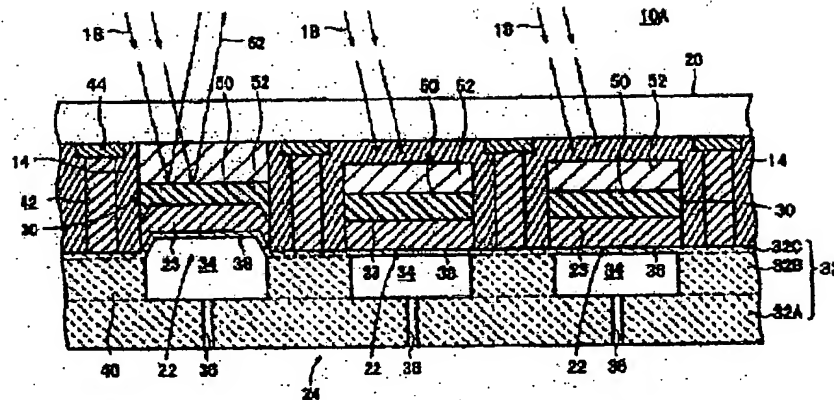
The above amendments and these remarks are responsive to the Office action dated July 28, 2006. Claims 1, 2, 5, 7-10, 12, 14, 16-20, 22, 23, 26-30, and 34-39 are pending in the application. In the Office action, the Examiner rejected claims 1, 2, 5, 7-10, 12, 14, 17-20, 22-23, 29, 30, 34, 35, and 36-39 under 35 U.S.C. 102(e) as being anticipated by U.S. Patent No. 6,753,846 to Takeuchi et al. ("Takeuchi et al."). Further, the Examiner rejected claims 1, 2, 5, 7, 9, 10, 12, 14, 23, 29, and 30 under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 6,188,815 to Schiaffino et al. Finally, the Examiner rejected claims 16 and 26-28 under 35 U.S.C. § 103(a) as unpatentable over Schiaffino et al. in view of U.S. Patent No. 6,924,792 to Jessop ("Jessop"). In view of the amendments above, and the remarks below, applicants respectfully request reconsideration of the application under 37 C.F.R. § 1.111 and allowance of the pending claims.

**Rejections Based on 35 U.S.C. § 102**

Applicants respectfully traverse the rejections made under 35 U.S.C. 102 based on Takeuchi et al. and Schiaffino et al. However, to further prosecution of the application, Applicants have amended certain claims for clarity.

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# 1. Rejections Based on Takeuchi et al.



Takeuchi et al. discloses a reflective display device 10A for displaying a screen image. Reflective display device 10A includes a transparent display panel 20 through which input light 18 enters a picture element assembly 30. Reflected light 62 exits device 10A through display panel 20 when picture element assembly 30 is configured for reflection. Picture element assembly 30 is configured for reflection when an actuator 23 moves a reflective layer 50 into a position to reflect input light 18 by displacing a light absorbing liquid 14.

Picture element assembly 30 defines a chamber with actuator 23 disposed beneath reflective layer 50, which is disposed beneath a color filter 52. Light absorbing liquid 14 surrounds picture element assembly 30. Light absorbing liquid 14 is normally disposed between display panel 20 and color filter 52 such that input light 18 is absorbed and not reflected. However, actuator 23 selectively moves color filter 52 and reflective layer 50 upwards to displace light absorbing liquid 14 out of the path of input light 18. Displacing light absorbing liquid 14 allows input light to reach color filter 52 and reflective layer 50 and accordingly be filtered and reflected.

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Claims 1, 2, 5, 7, and 8.

Takeuchi et al. does not disclose each feature recited in claim 1. Claim 1 as currently amended recites:

A light-filtering element for a display device, comprising:  
at least one filter having a chamber with a filtering fluid, the chamber defining an optical path entering a first side of the chamber and exiting a second side of the chamber opposite the first side; and  
a liquid motion actuator selectively configured to move the filtering fluid substantially into and out of the optical path.

Takeuchi et al. does not disclose a filter having a chamber defining an optical path entering a first side of the chamber and exiting a second side of the chamber opposite the first side. Instead, the Takeuchi et al. device inputs light 18 through display panel 20 and outputs reflected light 62 through the same display panel 20. Reflective layer 50 effectively precludes light from exiting picture element assembly 30 through a side opposite the side it entered. Thus, light in Takeuchi et al. enters and exits the same side of picture element assembly 30; light does not exit a second side of a chamber opposite the first side in which it entered.

Therefore, Applicants submit that Takeuchi et al. does not disclose each feature recited in claim 1. Accordingly, claim 1 is not anticipated by the reference under 35 U.S.C. § 102(e). Moreover, claims 2, 5, 7, and 8 depending from claim 1 are not anticipated by Takeuchi et al. for at least the same reasons as discussed for claim 1.

In addition to being allowable for the reasons discussed for claim 1, claim 5 is allowable on separate grounds. Claim 5 is additionally allowable because Takeuchi et al. does not disclose a light-filtering element including a chamber having dimensions that affect the intensity of light passing through the chamber. Light does not pass

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through a chamber in Takeuchi et al., but rather reflects back from reflective layer 52 or is absorbed by light absorbing liquid 14. Thus, the dimensions of the Takeuchi et al. picture element assembly do not effect the intensity of light passing through it. Accordingly, Takeuchi et al. does not disclose the features recited in claim 5 as necessary to anticipate claim 5.

Claims 9, 10, 12, and 14.

Claim 9 recites features that are not disclosed in Takeuchi et al. Claim 9 recites:

A color-generating device, comprising:  
a plurality of color elements disposed in an optical path entering a first side of the color elements and exiting a second side of the color elements opposite the first side, wherein each color element includes at least one filter having a chamber with a filtering liquid, the filtering liquid being selectively disposed in the optical path; and  
a liquid motion actuator configured to selectively move the filtering liquid into and out of the optical path.

Takeuchi et al. does not disclose an optical path entering a first side of a color element and exiting a second side of the color element opposite the first side. Instead, Takeuchi et al. shows light entering and exiting the same side of color filter 52. Reflective layer 50 causes light entering color filter 52 to reflect out the same side it entered instead of exiting from a side opposite the side it entered. Further, when light absorbing liquid 14 is disposed between display panel 20 and color filter 52, light neither enters nor exits color filter 52.

Because Takeuchi et al. does not disclose an optical path entering a first side of a color element and exiting a second side of the color element opposite the first side, it does not disclose each feature of claim 9. Accordingly, Takeuchi et al. does not anticipate claim 9 under 35 U.S.C. § 102(e). It follows then that the reference does not

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anticipate claims 10, 12, and 14 depending from claim 9. Applicants, therefore, request allowance of claims 9, 10, 12, and 14.

Claims 17-20, and 22.

Takeuchi et al. does not disclose each feature recited in claim 17. Claim 17 recites:

A display system, comprising:  
an illumination source configured to produce light and direct light along an optical path;  
a color generator disposed in the optical path, the color generator including one or more color elements, where one or more color elements has at least one filter with a color-filtering fluid and an associated liquid motion actuator, the liquid motion actuator configured to selectively move a substantial volume of the color-filtering liquid to selectively configure the filter in at least one of a filtering state and a non-filtering state, wherein light directed along the optical path enters a first side of the filter and exits a second side of the filter opposite the first side; and  
a display surface configured to receive light from the color generator to produce a color image.

Takeuchi et al. does not disclose an optical path entering a first side of a filter and exiting a second side of the filter opposite the first side. In Takeuchi et al., light either does not enter color filter 52 at all, or if it does enter color filter 52, it exits the filter from the same side it entered. When light absorbing liquid 14 is disposed between display panel 20 and color filter 52, no light enters color 52 because it is absorbed instead. When light does enter color filter 52, it is reflected out the same side it entered color filter 52 by reflective layer 50. Thus, Takeuchi et al. does not disclose the optical path recited in claim 17.

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Accordingly, Takeuchi et al. does not disclose each feature of claim 17 as necessary to anticipate it under 35 U.S.C. § 102(e). Further, the reference does not anticipate claims 18-20 and 22 depending from claim 17 either. Applicants, therefore, submit that claims 17-20 and 22 are allowable.

In addition to being allowable for the reasons discussed for claim 17, claim 19 is allowable for additional reasons. Takeuchi et al. does not disclose a transparent region where a color-filtering liquid is selectively positionable substantially outside the transparent region when a filter is in a non-filtering state. When the Takeuchi et al. device is in a non-filtering state, there is no transparent region because light absorbing liquid 14 completely fills the space between display panel 20 and picture element assembly 34. Thus, Takeuchi et al. does not disclose the transparent region feature recited in claim 19 as necessary to anticipate claim 19.

Claim 23.

Claim 23 recites features that are not disclosed in Takeuchi et al. Claim 23 recites:

A color element for a display system having a light source, the color element comprising:

a plurality of chambers, each chamber containing a filtering fluid; and  
an electrically-actuated element coupled with each chamber, the electrically-actuated element being configured to selectively alter each chamber to move the filtering fluid between a region of the chamber outside a light path and a region of the chamber within the light path;

**wherein the light path enters a first side of the chamber and exits a second side of the chamber opposite the first side.**

A light path entering a first side of a chamber and exiting a second side of the chamber opposite the first side is not disclosed in Takeuchi et al. To the contrary, Takeuchi et al. reflects light back out of the same side it enters color filter 52 with

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reflective layer 50. When the Takeuchi et al. device is not reflecting light, light is absorbed by light absorbing liquid 14 and it does not reach color filter 52. Thus, Takeuchi et al. does not disclose the light path recited in claim 23.

Thus, Takeuchi et al. does not disclose each feature of claim 23. Therefore, the reference does not anticipate claim 23 under 35 U.S.C. § 102(e). Accordingly, Applicants submit that claims 23 is allowable.

Claims 29, 30, and 34-36.

Takeuchi et al. does not disclose each feature recited in claim 29. Claim 29 recites:

A method of filtering light, the method comprising:  
directing light along an optical path ~~into~~ entering a first side of a filter  
and exiting a second side of the filter opposite the first side, the filter having  
filtering liquid moveable into and out of the optical path;  
selectively moving the filtering fluid within the filter; and  
directing light through the filter.

Directing light along an optical path entering a first side of a filter and exiting a second side of the filter opposite the first side is not shown in Takeuchi et al. Rather, Takeuchi et al. discloses either absorbing light before it reaches color filter 52 or reflecting light out the same side it entered color filter 52. Therefore, Takeuchi et al. does not disclose directing light along the optical path recited in claim 29.

Accordingly, Takeuchi et al. does not anticipate claim 29 or claims 30, and 34-36 depending from claim 29. Applicants, therefore, request allowance of claims 29, 30, and 34-36.

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Claims 37-39.

Claim 37 recites features that are not disclosed in Takeuchi et al. Claim 37

recites:

A color generator for a display system having an optical path, the color generator comprising:  
a first color filter within the optical path having a first color filtering liquid selectively adapted to filter impinging light;  
a second color filter within the optical path having a second color filtering liquid selectively adapted to filter impinging light;  
a third color filter within the optical path having a third color filtering liquid selectively adapted to filter impinging light;  
a first promotion means linked to the first color filter to promote motion of the first color filtering liquid into and out of the optical path;  
a second promotion means linked to the second color filter to promote motion of the second color filtering liquid into and out of the optical path; and  
a third promotion means linked to the third color filter to promote motion of the third color filtering liquid into and out of the optical path;  
wherein the optical path passes through a first side of the color generator and through a second side of the color generator opposite the first side.

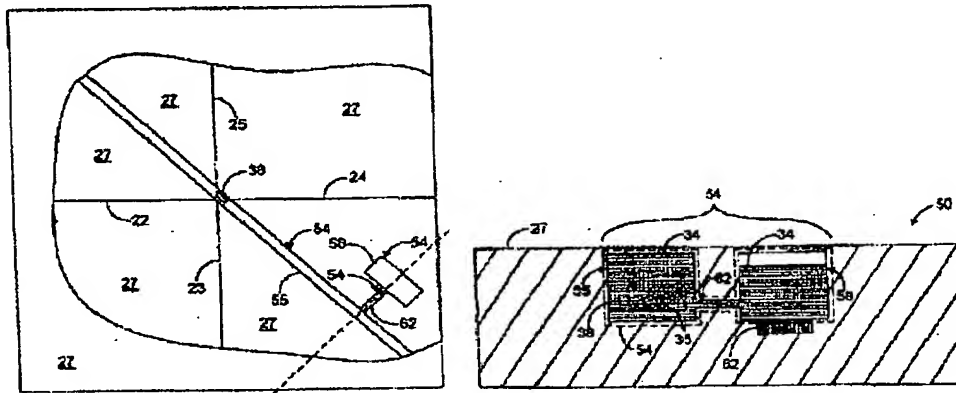
Takeuchi et al. does not disclose an optical path passing through a first side of the color generator and through a second side of the color generator opposite the first side. Instead, Takeuchi discloses light 18 passing through a first side of a picture element assembly 30 and out through the same side as it exits picture element assembly 30. Reflective layer 50 reflects light 18 back out through the same side it entered picture element assembly 30. The only other disclosed configuration of the Takeuchi et al. reflective display device absorbs light 18 with light absorbing liquid 14 before it reaches color filter 52.

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Therefore, Takeuchi et al. does not disclose the optical path recited in claim 37 as necessary to anticipate it under 35 U.S.C. § 102(e). It follows that Takeuchi et al. does not anticipate claims 38 and 39 depending from claim 37 either. Accordingly, Applicants request allowance of claims 37-39.

2. *Rejections based on Shiaffino et al.*



Shiaffino et al. discloses an optical switch designed to prevent inadvertent bubbles from forming in the switch. Inadvertent bubbles can cause optical switches to remain in an undesired state, i.e. activated or inactivated, despite an input directing the switch to change to a desired state. Inadvertent bubbles are controlled by a pressure controlling mechanism 50.

Optical switches selectively alter the path of light through the switch to register either an activated or deactivated state. The Shiaffino optical switch changes state by directing light toward different waveguide segments, e.g. waveguide segments 23-25. When a state change is desired, light originally directed towards waveguide segment 24

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is redirected towards waveguide segment 23. Light is redirected by forming a bubble 38 angled to reflect light towards waveguide segment 23.

Claims 1, 2, 5, and 7.

Shiaffino et al. does not disclose each feature recited in claim 1. Claim 1 as currently amended recites:

A light-filtering element for a display device, comprising:  
at least one filter having a chamber with a filtering fluid, the chamber defining an optical path entering a first side of the chamber and exiting a second side of the chamber opposite the first side; and  
a liquid motion actuator selectively configured to move the filtering fluid substantially into and out of the optical path.

Shiaffino et al. does not disclose a light-filtering element for a display device. Rather, Shiaffino et al. discloses an optical switch designed to redirect light, not filter light. An optical switch signals a change between activated and inactivated states using light, it does not alter a property of the light itself other than the direction it travels.

The Shiaffino et al. optical switch does not include a filtering fluid as recited in claim 1. While light is indeed directed through liquid 34, liquid 34 is not selected to filter light. Quite to the contrary, light 34 is selected so that its index of refraction is "matched sufficiently well to the index of refraction of the waveguide segments 22-25 [so] that light passes into and through the liquid 34 without significantly changing direction." [Col. 4, In 23-26]. Liquid 34 serves no other purpose than to form a bubble when heated to redirect light to a different waveguide segment. The bubble that forms functions to reflect light, not filter it.

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Shiaffino et al. does not disclose a light filtering element having at least one filter. Shiaffino simply does not include a filter. Instead, it shows an optical switch configured to direct light to different waveguide segments. Because optical switches perform a function wholly separate from filtering light, it is not surprising that the Shiaffino et al. optical switch does not include at least one filter as recited in claim 1.

A liquid motion actuator selectively configured to move a filtering fluid substantially into and out of an optical path is also not disclosed in Shiaffino et al. Actuator 84 in Shiaffino et al. does not function to move a filtering fluid into and out of an optical path, but rather functions to maintain the pressure of liquid 34 at a desired level sufficient to inhibit inadvertent bubble formation. Unlike gases, liquids are substantially incompressible fluids. Thus, no appreciable additional amount of liquid 34 is moved into chamber 54 when actuator 84 pressurizes liquid 34. Indeed, Shiaffino et al. discloses actuator 84 as simply part of a pressure controlling mechanism 52, not as being configured to move liquid 34 into and out of an optical path.

For at least these reasons, Shiaffino et al. does not disclose each feature recited in claim 1. Accordingly, claim 1 is not anticipated by the reference under 35 U.S.C. § 102(b). Moreover, claims 2, 5, and 7 depending from claim 1 are not anticipated by Shiaffino et al. for at least the same reasons as discussed for claim 1.

In addition to being allowable for the reasons discussed for claim 1, claim 2 is also allowable because Shiaffino et al. does not disclose a liquid motion actuator configured to selectively alter dimensions of the chamber to displace a filtering fluid from the optical path. Rather, Shiaffino et al. heats a liquid 34 to cause it to form a bubble.

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The dimensions of chamber 54 containing liquid 34 are not altered to form the bubble; rather, heat alone is used to form the bubble.

Similarly, claim 7 is additionally allowable for reasons beyond those discussed for claim 1 from which it depends. Shiaffino et al. does not disclose a liquid motion actuator configured to alter a chamber to effect displacement of a filtering fluid within the chamber. Instead, Shiaffino et al. heats a liquid 34 inside a chamber 54. Chamber 54 is not altered. Thus, Shiaffino et al. does not disclose altering a chamber as recited in claim 7.

Claims 9, 10, 12, and 14.

Claim 9 recites features that are not disclosed in Shiaffino et al. Claim 9 recites:

A color-generating device, comprising:  
a plurality of color elements disposed in an optical path entering a first side of the color elements and exiting a second side of the color elements opposite the first side, wherein each color element includes at least one filter having a chamber with a filtering liquid, the filtering liquid being selectively disposed in the optical path; and  
a liquid motion actuator configured to selectively move the filtering liquid into and out of the optical path..

Shiaffino et al. does not disclose a color generating device as recited in claim 9. An optical switch is not a color generating device and Shiaffino et al. makes no mention of generating color with its optical switch. Thus, the Shiaffino et al. optical switch is not a color generating device

Further, Shiaffino et al. does not disclose a plurality of color element disposed in an optical path. Each color element recited in claim 9 includes at least one filter having a chamber with a filtering liquid. In Shiaffino et al., either liquid 34 or bubble 41 are

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disposed in a path that light travels depending on the state of the switch. Neither liquid 34 or bubble 41 are a filter or a filtering liquid. Liquid 34 is selected to not reflect light traveling along its current path and bubble 41 functions to reflect light towards a different path. Liquid 34 and bubble 41 are not disclosed as having any properties relevant to color or filtering. Thus, one skilled in the art would not interpret either liquid 34 or bubble 41 as a filter or a filtering liquid. Accordingly, Schiaffino et al. does not include a plurality of color elements disposed in an optical path as recited in claim 9.

Shiaffino et al. does not disclose a liquid motion actuator selectively configured to move a filtering fluid substantially into and out of a optical path. Actuator 84 which is part of a pressure controlling mechanism 52 is not a liquid motion actuator configured to move a filtering liquid into an out of an optical path. Rather, Shiaffino shows only that actuator 84 functions to maintain liquid 34 at a pressure sufficient to stop inadvertent bubbles from forming. Thus, Schiaffino et al. fails to disclose the liquid motion actuator disclosed in claim 9.

Therefore, Applicants submit that Schiaffino et al. fails to anticipate claim 9 under 35 U.S.C. § 102(b). It follows then that Schiaffino et al. does not anticipate claims 10, 12, and 14 either for at least the same grounds. Accordingly, Applicants request allowance of claims 9, 10, 12, and 14.

In addition to being allowable for the reasons presented for claim 9, claim 10 provides additional grounds for allowance. Shiaffino et al. does not disclose a liquid motion actuator configured to selectively alter a chamber to move a filtering liquid into and out of the optical path as recited in claim 10. Rather, Shiaffino et al. heats liquid 34

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to cause it to form a bubble 41 in the path light travels. Moreover, actuator 84 does not move liquid 34 or alter chamber 54, but rather controls the pressure of liquid 34 to prevent inadvertent bubble formation.

Claim 14 is similarly allowable for additional reasons. Shiaffino et al. does not disclose a liquid motion actuator configured to alter the chamber to selectively move the filtering liquid into and out of the optical path as recited in claim 14. Thus, Shiaffino et al. does not anticipate claim 14.

Claim 23.

Claim 23 recites features that are not disclosed in Shiaffino et al. Claim 23 recites:

A color element for a display system having a light source, the color element comprising:

a plurality of chambers, each chamber containing a filtering fluid; and  
an electrically-actuated element coupled with each chamber, the electrically-actuated element being configured to selectively alter each chamber to move the filtering fluid between a region of the chamber outside a light path and a region of the chamber within the light path;

wherein the light path enters a first side of the chamber and exits a second side of the chamber opposite the first side.

Shiaffino et al. does not disclose a color element for a display system. Instead, Shiaffino et al. discloses an optical switch that is not described as having anything to do with color or display systems. An optical switch is more akin to logic gates and electronic control components than to color elements or display systems.

A plurality of chambers each containing a filtering fluid is not disclosed in Shiaffino et al. Rather, Shiaffino et al. discloses a switch with a chamber 54 containing liquid 34. Liquid 34 is not a filtering fluid because it does not filter light. Instead, liquid

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34 is selected to not interfere with light as it passes through and is also selected to form a bubble 41 when heated to redirect light.

Shiaffino et al. also does not disclose an electrically-actuated element configured to selectively alter each chamber to move the filtering fluid between a region of the chamber outside a light path and a region of the chamber within the light path. The Examiner cites actuator 84, but actuator 84 does not alter a chamber and does not move a filtering fluid into and out of a light path. Instead of moving liquid 34, actuator 84 is part of a pressure control mechanism 52 used to pressurize liquid 34 to prevent inadvertent bubbles from forming. A heater in Shiaffino et al. causes a bubble 41 to form in a light path to redirect light along a different path. Thus, actuator 84 does not move liquid 34 into and out of a light path and Shiaffino et al. does not disclose altering chamber 54 to the best of Applicants' knowledge.

For at least these reasons, Shiaffino et al. does not disclose each feature of claim 23. Applicants, therefore, submit that claim 23 is allowable under 35 U.S.C. § 102(b).

#### Claims 29 and 30

Schiaffino et al. does not disclose each feature recited in claim 29. Claim 29 recites:

A method of filtering light, the method comprising:  
directing light along an optical path ~~into~~ entering a first side of a filter  
and exiting a second side of the filter opposite the first side, the filter having  
filtering liquid moveable into and out of the optical path;  
selectively moving the filtering fluid within the filter; and  
directing light through the filter.

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Schiaffino et al. does not disclose a method of filtering light, but instead discloses a method of redirecting light in an optical switch. Redirecting the path of light with a reflective bubble 41 is not filtering light. Further, passing light through a liquid 34 that does not cause any specified property change in the light is not filtering light. Thus, Schiaffino et al. does not disclose a method of filtering light as recited in claim 29.

Directing light into a first side of a filter having a filtering liquid is not shown in Schiaffino et al. Indeed, Schiaffino et al. does not disclose a filter or a filtering liquid through which light may be directed. Neither bubble 41 nor liquid 34 is a filtering liquid. Liquid 34 is not a filtering liquid because it is selected specifically to not effect light passing therethrough. (See Col. 4, lines 23-26). Bubble 41 is also not a filtering liquid because it reflects light. Thus, light is not directed through a filter having a filtering liquid in Schiaffino et al.

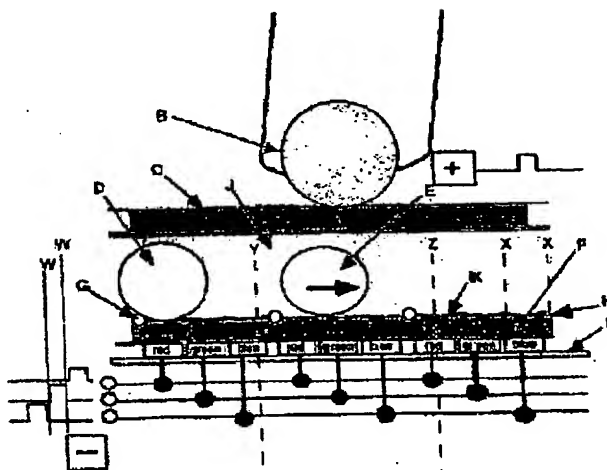
For at least these reasons, Applicants submit that Schiaffino et al. fails to disclose each feature of claim 29. Accordingly, Schiaffino et al. does not anticipate claim 29 or claim 30 depending therefrom under 35 U.S.C. § 102(b).

**Rejections under 35 USC § 103**

Applicants respectfully traverse the rejections made under 35 U.S.C. 103(a) based on Schiaffino et al in view of Jessop. However, to further prosecution of the application, Applicants have amended certain claims for clarity.

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Jessop discloses electrowetting and electrostatic screen display systems. An electrostatically charged droplet serves as a magnifying lens and moves in response to a user's movement of a stylus. In some examples, electrowetting forces cause the droplet to move. A user observes a color corresponding to a colored indicia that the droplet passes over because the droplet magnifies that colored indicia.

#### Claim 16.

Combining Shiaffino et al. with Jessop does not disclose each feature recited in claim 16 as necessary to establish that claim 16 is *prima facie* obvious. As an initial matter, the Examiner cites Jessop as allegedly disclosing the surface treatment feature recited in claim 16, but the surface properties disclosed in Jessop do not pertain to promoting the flow of a filtering liquid. Rather, Jessop discloses surface properties relevant to moving a droplet that serves as a lens.

However, combining the cited references does not disclose features recited in claim 16 even if Jessop were interpreted to disclose features relevant to the surface treatments. Claim 16 incorporates the features recited in claims 9 and 14, including a

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color element, a filter, a filtering liquid, and a liquid motion actuator. Combining Schiaffino et al. and Jessop does not disclose each of these features.

For example, the references in combination do not disclose a filtering liquid as a component of a color element. Rather, Shiaffino et al. discloses a liquid selected to not interfere with light until it forms a bubble and Jessop discloses a droplet that serves as a magnifying lens. Neither the bubble forming liquid or the droplet functions to filter light.

In addition, the cited references do not disclose a liquid motion actuator configured to move the filtering liquid into and out of an optical path. Instead, Schiaffino et al. discloses only a pressure control mechanism including an actuator. The actuator in the pressure control mechanism maintains a liquid at a pressure sufficient to inhibit inadvertent bubbles from forming. The actuator in Schiaffino et al. does not move a liquid into and out of an optical path however.

For at least these reasons, combining Schiaffino et al. and Jessop does not disclose each feature of claim 16 as necessary to establish a *prima facie* case of obviousness under 35 U.S.C. § 103(a).

Claims 26-28.

Combining Schiaffino et al. with Jessop does not disclose each feature recited in claims 26-28 as necessary to establish a *prima facie* case that the claims are obvious under 35 U.S.C. § 103(a). Claims 26-28 incorporate the features of claim 23 therein. Because the cited references do not disclose the features recited in claim 23, they can not disclose each of the features recited in the rejected claims 26-28.

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The cited references do not disclose a plurality of chambers each containing a filtering fluid. A droplet used as a lens as disclosed in Jessop is not a filtering fluid. Further, the liquid disclosed in Schiaffino et al. is not a filtering fluid because it is selected for reasons wholly separate from filtering light. For example, the Schiaffino et al. liquid is selected to not reflect light and to form a bubble when heated. Thus, combining the references does not disclose chambers containing a filtering fluid as recited in claim 23.

Moreover, the cited references do not disclose an electrically-actuated element coupled to each chamber and configured to move filtering fluid. Jessop discloses moving a droplet using electrowetting forces, but does not disclose an electrically-actuated element coupled to a chamber or moving filtering fluid. Schiaffino et al. discloses an actuator that maintains a pressure of a liquid, but not an electrically-actuated element configured to move filtering fluid. Schiaffino et al. does not include filtering fluid and, in any case, the actuator it discloses does not actually move a liquid, but rather pressurizes the liquid.

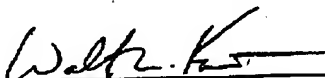
Accordingly, the cited references do not disclose each feature recited in claims 26-28 and do not render the claims *prima facie* obvious under 35 U.S.C. § 103(a). Therefore, Applicants respectfully request allowance of claims 26-28.

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Applicants believe that this application is now in condition for allowance, in view of the above amendments and remarks. Accordingly, applicants respectfully request that the Examiner issue a Notice of Allowability covering the pending claims. If the Examiner has any questions, or if a telephone interview would in any way advance prosecution of the application, please contact the undersigned attorney of record.

Respectfully submitted,

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CERTIFICATE OF FACSIMILE TRANSMISSION

I hereby certify that this correspondence is being facsimile transmitted to Examiner C. Mahoney, Group Art Unit 2851, Assistant Commissioner for Patents, at facsimile number (571) 273-8300 on October 30, 2006.



Christie A. Doolittle

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